

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

JEROME LASSITER

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No. 04-10114-DPW

MOTION TO CONTINUE DEADLINE FOR DISPOSITIVE MOTIONS

Defense counsel, John H. Cunha Jr., hereby moves this Court to continue the deadline for filing dispositive motions in Mr. Lassiter's case beyond July 23, 2004. As reasons herein, counsel states that after the conclusion of another client's trial before Judge Young in mid-June, he has spent significant time preparing motions and hearing materials for other pending federal cases, including a matter before Judge Gertner involving complex sentencing issues arising from the Supreme Court's recent decision in Blakely v. Washington, 2004 WL 1402697 (June 24, 2004), which needed to be immediately addressed.

Counsel recently received a voluminous amount of discovery in the case at bar, which will require more time to examine and properly determine if dispositive motions must be filed to protect the defendant's rights. Counsel moves for the Court to continue the filing deadline indefinitely or to a date in mid- to late August, providing a reasonable period to analyze the materials.

JEROME LASSITER

By his attorney,

/s/ John H. Cunha Jr.

John H. Cunha Jr.

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Dated: July 22, 2004